

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC,  
Plaintiff,

v.

T-MOBILE USA, INC.  
Defendant,

NOKIA OF AMERICA CORPORATION,  
ERICSSON INC.  
Intervenors.

CASE NO. 2:22-cv-00477-JRG-RSP  
(Lead Case)

**JURY TRIAL DEMANDED**

COBBLESTONE WIRELESS, LLC,  
Plaintiff,

v.

AT&T SERVICES, INC.; AT&T MOBILITY  
LLC; AT&T CORP.,  
Defendants,

NOKIA OF AMERICA CORPORATION,  
ERICSSON INC.  
Intervenors.

CASE NO. 2:22-cv-00474-JRG-RSP  
(Member Case)

JURY TRIAL DEMANDED

COBBLESTONE WIRELESS, LLC,  
Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS,  
Defendant,

NOKIA OF AMERICA CORPORATION,  
ERICSSON INC.  
Intervenors.

CASE NO. 2:22-cv-00478-JRG-RSP  
(Member Case)

JURY TRIAL DEMANDED

**JOINT MOTION TO AMEND DOCKET CONTROL ORDER**

Plaintiff Cobblestone Wireless, LLC and Defendants T-Mobile USA, Inc., AT&T Services Inc., AT&T Mobility LLC, AT&T Corp., and Cellco Partnership d/b/a (collectively, the “Parties”) file this Joint Motion to Amend the Docket Control Order (Dkt. No. 139) specifically as to the deadlines to exchange and/or file deposition designations.

Upon their showing of good cause, the parties request to extend (1) the deadlines to exchange deposition designations, rebuttal deposition designations, and objections to the same, if any, as well as (2) the deadline for the parties to file the updated deposition designations with the Court. Good cause justifies these amendments where applicable to the Docket Control Order.

In particular, the Parties believe the below proposal is in line with modifications approved in prior, recent cases in front of Chief Judge Gilstrap. *See, e.g., Correct Transmission, LLC v. Nokia of Am. Corp.*, No. 2:22-cv-343, Dkt. 146 (E.D. Tex. Jan. 26, 2024); *Smart Path Connections, LLC v. Nokia of Am. Corp.*, No. 2:22-cv-296, Dkt. 162 (E.D. Tex. Jan. 12, 2024); *Godo Kaisha IP Bridge 1 v. Telefonaktiebolaget LM Ericsson et al.*, No. 2:21-cv-213, Dkt. 179 (E.D. Tex. July 27, 2022); *IPCom GMBH & Co. KG v. AT&T Inc., et al.*, No. 2:20-cv-0322-JRG, Dkt. 258 (E.D. Tex. Feb. 8, 2022); *Oyster Optics v. Cisco Sys.*, No. 2:20-cv-211, Dkt. 85 (E.D. Tex. Aug. 9, 2021).

Specifically, the parties propose the following schedule to govern the exchange and/or filing of the parties’ respective deposition designations and objections:

Event	Current Deadline <sup>1</sup>	Joint Proposed Deadline
Serve Deposition Designations by the Party with the Burden of Proof	July 8, 2024	August 26, 2024
Serve Objections to Deposition Designations; and Serve Rebuttal Deposition Designations	July 22, 2024	September 3, 2024
Serve Objections to Rebuttal Deposition Designations	July 29, 2024	September 9, 2024

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<sup>1</sup> See Dkt. 139.

File Updated Designations	Deposition	August 12, 2024	September 16, 2024
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This request is made to avoid raising needless disputes before the Court. In total, over 30 depositions were taken in this case. The parties anticipate that as the case moves closer to trial, the issues to be tried to the jury will be narrowed, and the Parties can present narrowed disputes to the Court. For example, there are various witnesses related to claims or defenses that may be resolved by the Parties' forthcoming summary judgment and *Daubert* motions. The parties believe they can conserve judicial resources under their proposed schedule by presenting disputes for witnesses that takes into account any narrowing of the issues in the case.

For the foregoing reasons, the parties respectfully request the attached Amended Docket Control Order be entered.

Dated: July 3, 2024

Respectfully submitted,

/s/ Jonathan Ma

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on this 3<sup>rd</sup> day of July 2024.

/s/ David S. Frist  
David S. Frist

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff conferred with counsel for Defendant, and this motion is joint.

/s/ David S. Frist  
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